

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

JASMINE CLARK and SIMONE
LEGREE, individually and on behalf of
all other similarly situated individuals,

Plaintiffs,

v.

INTELENET AMERICA LLC (now
known as Teleperformance Business
Services US, LLC),

Defendant.

Case No. 2:18-cv-14052-MCA-JSA

Motion Day: June 21, 2021

ANJELICA PICKETT, MINDY
CHURCH, AND TAYLOR FETT,
individually and on behalf of all other
similarly situated individuals,

Plaintiffs,

v.

INTELENET AMERICA LLC (now
known as Teleperformance Business
Services US, LLC),

Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS SETTLEMENT**

Plaintiffs, Jasmine Clark, Simone Legree, Anjelica Pickett, Mindy Church,
and Taylor Fett, (“Plaintiffs”), on behalf of themselves and all other similarly

situated individuals, respectfully move unopposed, pursuant to Section 16(b) of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b), and Fed. R. Civ. P 23 for entry of an order (1) consolidating this action with the action *Anjelica Pickett, Mindy Church, and Taylor Fett v. Intelenet America, LLC*, Case No. _____ (D.N.J.) (formerly Case No. 2:19-cv-04574-PBT (E.D. Pa.)); (2) preliminarily approving the proposed settlement; (3) preliminarily certifying the Settlement Classes under Fed. R. Civ. P. 23; (4) preliminarily confirming Jason T. Brown and Nicholas Conlon of Brown, LLC, and Jason J. Thompson and Rod M. Johnston of Sommers Schwartz, P.C. as Class Counsel; (5) preliminarily confirming Jasmine Clark, Simone Legree, Anjelica Pickett, Mindy Church, and Taylor Fett as Class Representatives; (6) preliminarily confirming Simpluris, Inc. as the Claims Administrator; (7) approving notice to the Settlement Classes; and (8) scheduling a Final Approval Hearing.

This motion is based on the accompanying Brief, Stipulation of Settlement, Declaration of Plaintiffs’ counsel Jason T. Brown, exhibits thereto (all filed contemporaneously herewith) and argument of Counsel. Defendant does not oppose the relief being requested.

Dated: May 28, 2021

Respectfully submitted,

/s Jason T. Brown

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CERTIFICATE OF SERVICE

I certify that on May 28, 2021, I electronically filed the forgoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

/s Jason T. Brown

Jason T. Brown